

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Troy Englert,)
)
)
Plaintiff,)
)
) Civil Action No. 1:15-cv-303-GBL-MSN
v.)
)
)
Nationstar Mortgage, Inc., *et al.*,)
)
)
Defendants.)
)
_____)

DEFENDANTS' PROPOSED VOIR DIRE

Defendants Virginia Nationstar Mortgage, LLC and Defendant Nationstar Home Equity Loan 2009-A REO, LLC (together, “Nationstar”), by counsel, submit the following proposed *voir dire* and respectfully requests that Court ask these questions in addition to those standard questions asked by the Court as well as those offered by the other parties without objection:

I. KNOWLEDGE OF THE PARTIES, WITNESSES, ATTORNEYS, AND MEMBERS OF THE PANEL

1. Do you know any other member of the jury panel either personally or professionally?
2. Do you know, either personally or professionally, any of the attorneys involved in this case:
 - a) Richard Murray and Ian Cronogue with the firm of Murray, Cronogue & Werfel, PLC – representing Troy Englert;
 - b) Kyle Deak and Mohsin Reza with the law firm of Troutman Sanders LLP – representing Nationstar; and

3. Have you or any immediate family member, or any close friend, ever worked for any of the attorneys or at the firms identified for the parties in this case?

4. Have you or any immediate family member, or any close friend, ever been represented by any of the attorneys or their firms identified for the parties in this case?

5. Have you or any members of your immediate family, or a close friend, ever done business or had a personal acquaintance with any of the parties to this case? The parties are: Troy Englert and Nationstar Mortgage, LLC.

6. Have you or any members of your immediate family, or any close friend, ever done business with or worked for Nationstar, First Tennessee Bank, First Horizon, MetLife, or Bank of New York?

7. Have you or any members of your immediate family, or any close friend, ever had a loan with Nationstar, First Tennessee, First Horizon, MetLife, or Bank of New York?

8. Have you or any members of your immediate family, or any close friend, ever done business Troy Englert, Burke & Herbert Bank, ENG Import Group, LLC, or Patrick's Designs?

9. Do you or any relative or close friend, have a personal acquaintance with or know of any of the following persons who might be called to testify as witnesses?

Taylor Burke

Kamla Rodriguez

Steve Mecca

Patrick Dempsey

II. LEGAL KNOWLEDGE AND THE LEGAL PROCESS

10. Have you ever been a plaintiff or defendant in a civil lawsuit?
11. Have you ever served as a juror in a civil lawsuit?
 - a) When?
 - b) What kind of case?
 - c) How was it resolved?
 - d) Was there anything about that experience that would prevent you from acting as a fair impartial juror in this case?
12. Have you ever served as a juror in a mock jury or a mock trial?
 - a) When?
 - b) What kind of case?
 - c) How was it resolved?
 - d) Was there anything about that experience that would prevent you from acting as a fair impartial juror in this case?
13. Have you ever been a witness in any lawsuit or other proceeding, including being deposed or testifying before an administrative body? If yes, explain. How, if at all, would that affect your ability to serve as a juror?
14. Do you have any legal training, any law school education, or any experience working in the legal field, such as with a law firm or the legal department of any company or governmental agency? If yes, please describe that training, education or experience.
15. Are you or an immediate family member, or close friend, a judge, lawyer, or paralegal?
16. Do you or an immediate family member, or close friend hold a law degree?

17. Do you have any opinions about the legal system that would prevent you from being a fair and impartial juror in this case?

III. CASE RELATED ISSUES

18. Do you have any training, education, experience or knowledge concerning:

- a) loan servicing; or
- b) real property insurance; or
- b) mortgage lending

19. Have you, or any member of your immediate family, ever been involved in the loan servicing business?

20. Do you have any opinions about lenders or loan servicers that would prevent you from being a fair and impartial juror in this case?

21. Are you or any of your family members employed in the banking or lending industry?

22. Has any property owned by you or any family member been the subject of a foreclosure proceeding?

23. Have your or any family member ever had a dispute with a financial institution or company over a loan? If yes, what institution?

24. Have you or any family member ever disputed how a servicer or other financial institution was handling a loan?

25. Have you or any family member ever been sued for an unpaid debt?

26. Have you or any family member ever sued anyone for an unpaid debt that you believed was owed to you or to that family member?

Respectfully submitted,

/s/ S. Mohsin Reza

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Counsel for Defendants Virginia Nationstar Mortgage, LLC and Defendant Nationstar Home Equity Loan 2009-A REO, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 28th of December, 2015, a true and correct copy of the foregoing was filed with the Clerk of the Court using CM/ECF, which will send a notice of electronic filing (NEF) to all registered users listed below:

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